

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND
SECURITIES, BUREAU OF SECURITIES
LICENSING COMPLIANCE AND
ENFORCEMENT

PA DEPARTMENT OF
BANKING AND SECURITIES

v.

QUATTRO ADVISORS, LLC

Docket No.: 13 0063 (SEC-CAO)

CONSENT AGREEMENT AND ORDER

The Commonwealth of Pennsylvania acting through the Department of Banking and Securities (“Department”) Bureau of Securities Licensing, Compliance and Enforcement (“Bureau”) has conducted an investigation of the business practices of Quattro Advisors, LLC (“Quattro”) and its officers and employees. Based on the results of its investigation, the Bureau has concluded that Quattro has operated in violation of the Pennsylvania Securities Act of 1972, 70 P.S. § 1-101 et. seq. (“1972 Act”). Quattro, in lieu of litigation, and without admitting or denying the allegations herein, and intending to be legally bound, hereby agrees to the terms of this Consent Agreement and Order (“Order”).

BACKGROUND

1. The Department is the Commonwealth of Pennsylvania’s administrative agency authorized and empowered to administer and enforce the 1972 Act.
2. The Bureau is primarily responsible for administering and enforcing the 1972 Act for the Department.
3. Quattro, CRD #146438, was, at all times material herein, a Pennsylvania Limited Liability Company with an address at 11 Stanwix Street, Suite 1220, Pittsburgh, PA 15222.

4. From on or about May 30, 2008 through the present, Quattro has been registered as an investment adviser pursuant to Section 301(c) of the 1972 Act, 70 P.S. § 1-301(c) and engaged in the business of advising others, for compensation, on the purchase and sale of securities in Pennsylvania.

5. In or about February 2013, Quattro notified the Bureau that it had inadvertently failed to register at least one employee as an investment adviser representative in Pennsylvania.

VIOLATION

6. By engaging in the acts and conduct set forth in Paragraph 5 above, Respondent Quattro employed at least one unregistered investment adviser representative in violation of Section 301(c.1)(1)(i) of the 1972 Act, 70 P.S. § 1-301(c.1)(1)(i).

AUTHORITY

7. Because Quattro employed an unregistered investment adviser representative in Pennsylvania in violation of Section 301(c.1)(1)(i) of the 1972 Act, 70 P.S. § 1-301(c.1)(1)(i), the Department has the authority to impose sanction on Quattro.

8. Because Quattro employed an unregistered investment adviser representative in Pennsylvania in violation of Section 301(c.1)(1)(i) of the 1972 Act, 70 P.S. § 1-301(c.1)(1)(i), the Department has the authority to impose an administrative assessment of up to \$100,000.00 for each act or omission that constitutes a violation, and also order Quattro to pay the costs of the investigation, see 70 P.S. § 1-602.1(c)(1)(i) and 70 P.S. § 1-602(b).

RELIEF

9. Quattro shall pay the Department an administrative assessment in the amount of \$10,000.00. Payment shall be made by certified check or money order made payable to the "Department of Banking and Securities" and shall be mailed or delivered, in person, to the

Bureau of Securities Licensing, Compliance and Enforcement, located at 17 N. Second Street, Suite 1300, Harrisburg, PA 17101.

10. Quattro shall pay to the Department investigative and legal costs in the amount of \$1,000.00. Payment shall be made by certified check or money order made payable to the "Department of Banking and Securities" and shall be mailed or delivered, in person, to the Bureau of Securities Licensing, Compliance and Enforcement, located at 17 N. Second Street, Suite 1300, Harrisburg, PA 17101.

11. The investigative and legal costs and the administrative assessment shall be paid as follows:

- a) \$1,000.00 investigative and legal costs and \$1,000.00 administrative assessment on or before October 1, 2013;
- b) \$2,000.00 administrative assessment on or before November 1, 2013;
- c) \$2,000.00 administrative assessment on or before December 1, 2013;
- d) \$2,000.00 administrative assessment on or before January 1, 2014;
- e) \$2,000.00 administrative assessment on or before February 1, 2014;
- f) \$1,000.00 administrative assessment on or before March 1, 2014.

12. Quattro is ORDERED to comply with the 1972 Act and Regulations adopted by the Department and in particular 301(c.1)(1)(i) of the 1972 Act, 70 P.S. § 1-301(c.1)(1)(i).

13. Should Quattro fail to pay the costs and the assessment as set forth in paragraphs 9, 10 and 11 above, the sanctions set forth elsewhere in the Order shall continue in full force and effect until full payment is made. However, this provision shall not be construed as affording Quattro the option of either paying the costs and the assessment or being indefinitely subject to the sanctions.

14. Should Quattro fail to comply with any and all provisions of this Order, the Department may impose additional sanctions and costs and seek other appropriate relief subject to Quattro's right to a hearing pursuant to the 1972 Act.

FURTHER PROVISIONS

15. Consent. Quattro hereby knowingly, willingly, voluntarily and irrevocably consents to the entry of this Order pursuant to the Bureau's authority under the 1972 Act and agrees that it understands all of the terms and conditions contained herein. Quattro, by voluntarily entering into this Order, waives any right to a hearing or appeal concerning the terms, conditions and/or penalties set forth in this Order.

16. Entire Agreement. This Order contains the entire agreement between the Department and Quattro. There are no other terms, obligations, covenants, representations, statements, conditions, or otherwise, of any kind whatsoever concerning this Order. This Order may be amended in writing by mutual agreement by the Department and Quattro.

17. Binding Nature. The Department, Quattro, and all officers, owners, directors, employees, heirs and assigns of Quattro intended to be and are legally bound by the terms of this Order.

18. Counsel. This Order is entered into by the parties upon full opportunity for legal advice from legal counsel.

19. Effectiveness. Quattro hereby stipulates and agrees that the Order shall become effective on the date the Bureau executes the Order ("Effective Date").

20. Other Enforcement Action.

(a) The Department reserves all of its rights, duties, and authority to enforce all statutes, rules and regulations under its jurisdiction against Quattro in the future regarding all matters not resolved by this Order.

(b) Quattro acknowledges and agrees that this Order is only binding upon the Department and not any other local, state or federal agency, department or office regarding matters within this Order.

21. Authorization. The parties below are authorized to execute this Order and legally bind their respective parties.

22. Counterparts. This Order may be executed in separate counterparts, by facsimile and by PDF.

23. Titles. The titles used to identify the paragraphs of this document are for the convenience of reference only and do not control the interpretation of this document.

24. Finding. The Department finds that it is necessary and appropriate in the public interest and for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the 1972 Act to issue this Order.

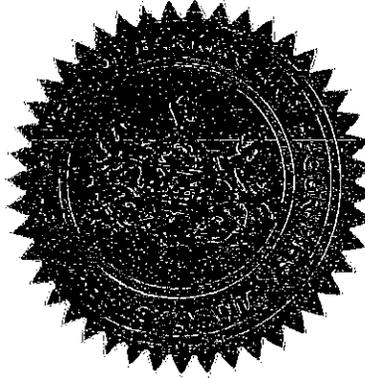
WHEREFORE, in consideration of the foregoing, including the recital paragraphs, the Commonwealth of Pennsylvania, Department of Banking and Securities, Bureau of Securities Licensing, Compliance and Enforcement and Quattro Advisors, LLC intending to be legally bound do hereby execute this Consent Agreement and Order.

**FOR THE COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES
BUREAU OF SECURITIES LICENSING, COMPLIANCE AND ENFORCEMENT:**

By: _____

Victoria A. Reider
Executive Deputy Secretary

Dated: 10/10/13



FOR QUATTRO ADVISORS, LLC:

By: _____

(Officer Signature)

By: Luigi G. DiIanni

(Print Officer Name)

Title: Advisor/Founder

Dated: 09-30-13

9/30/13

